

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

HODELL-NATCO INDUSTRIES, INC.)	CASE NO. 1:08 CV 2755
)	
Plaintiff,)	JUDGE DONALD C. NUGENT
)	
-VS-)	
)	
SAP AMERICA, INC., et al.)	
)	
Defendants.)	

**UNOPPOSED MOTION TO CONTINUE DEFAULT JUDGMENT HEARING
SET FOR JULY 23, 2015**

Plaintiff Hodell-Natco Industries, Inc., through undersigned counsel, requests that the Court continue the default judgment hearing currently scheduled for July 23, 2015. The undersigned has conferred with counsel for Defendants SAP America, Inc. and SAP AG, who have indicated they agree to the continuance. Counsel for the parties are available on August 13, 2015 for the rescheduled hearing and will make themselves available for a conference call with the Court to set a new hearing date in the event the Court's schedule requires an alternative date.

Dated: July 22, 2015

Respectfully submitted,

/s/ P. Wesley Lambert

Christopher J. Carney (0037597)

Sharon A. Luarde (0071625)

P. Wesley Lambert (0076961)

BROUSE MCDOWELL

600 Superior Ave. E., Suite 1600

Cleveland, Ohio 44114

(216) 830-6830 phone

(216) 830-6807 fax

CCarney@brouse.com

SLuarde@brouse.com

WLambert@brouse.com

*Attorneys for Plaintiff Hodell-Natco
Industries, Inc.*

CERTIFICATE OF SERVICE

The undersigned certifies that on July 22, 2015, the foregoing was filed electronically.

Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

Parties may access the document through the Court's electronic filing system.

/s/ P. Wesley Lambert

P. Wesley Lambert, Esq. (0076961)

*Attorney for Plaintiff Hodell-Natco
Industries, Inc.*

939974